

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Muhammed K. Abbasi	:	Chapter 13
	:	Case No. 22-10583-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY PHILADELPHIA FEDERAL CREDIT UNION

Debtor, Muhammed K. Abbasi, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Philadelphia Federal Credit Union and hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part, Denied in part. Debtor admits that payments were late and avers that payments have been brought current to date.
8. Debtor unsure of the same.
9. Denied.
10. Admitted.
11. Denied. Debtor has paid the account current to date and wishes to retain the vehicle.
12. Denied.
13. Debtor opposes the same.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: July 28, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Jason Brett Schwartz, Esq.
Attorney for Movant *Philadelphia Federal Credit Union*
Electronic Notice to jschwartz@mesterschwartz.com

Dated: July 28, 2022

/s/Brad J. Sadek, Esq_____
Brad J. Sadek, Esq.
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